

ORIGINAL

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

Revocation of License of  
SANDRA V. CRANE  
Amateur Radio Station N6TFO  
Marina Del Ray, California

and

Suspension of License of

SANDRA V. CRANE  
Amateur Extra Class  
Radio Operator License

and

Revocation of License of

CHARLES P. PASCAL  
Amateur Radio Station WB6CIY  
Carson City, Nevada

and

Suspension of License of

CHARLES P. PASCAL  
Amateur Extra Class  
Radio Operator License

To: Hon. Joseph Chachkin  
Administrative Law Judge

PR Docket No. 92-119

RECEIVED

NOV - 4 1992

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

**REQUEST FOR AWARD UNDER EQUAL ACCESS TO JUSTICE ACT**

Sandra V. Crane and Charles P. Pascal, by their counsel and pursuant to Section 1.1501 et. seq. of the Commission's Rules and Regulations apply for an award of fees and costs pursuant to the Equal Access to Justice Act, 5 U.S.C. Section 504 ("EAJA"). In support, the following is shown:

1. Ms. Crane and Mr. Pascal were respondents in the above captioned proceeding, which as a revocation and suspension proceeding, is a case to which the EAJA applies.

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2. As is demonstrated in Exhibits A and B, both Ms. Crane and Mr. Pascal have a net worth under \$2,000,000.

3. In defending themselves in this proceeding, Mr. Pascal and Ms. Crane incurred fees and expenses in the amount of \$26,860.85 from the law firm of Lukas, McGowan, Nace & Gutierrez, Chartered, and Ms. Crane incurred \$14,322.87 from the law firm of Barab and Hart. Applying the \$75 per hour attorneys' fee limit contained in the Commission's rules, \$12,544.62 of Lukas McGowan's charges and \$6,122 of Barab and Hart's charges are reimburseable under the Act.<sup>1/</sup>

4. In the instant proceeding, pursuant to an order to show cause issued on April 24, 1992, the Private Radio Bureau ("Bureau") sought to suspend and revoke the licenses of the respondents on the basis of three issues. They were (1) whether the respondents willfully and repeatedly violated Rule Section 97.17 in connection with amateur examinations administered on August 4, 1991, August 24, 1991 and September 14, 1991; (2) whether Ms. Crane violated Rule Sections 97.17(e), 97.515, or

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<sup>1/</sup> The EAJA indicates that the agency should re-evaluate the \$75 figure based on changes in the cost of living: yet, this agency has made no increase in the \$75 figure since enacting rules to implement the EAJA. The EAJA was originally enacted in 1980, and it is now, 1992, the Commission is required to increase the attorneys' fee hourly rate by at least the rate of increase in the consumer price index from January 1, 1981 to September 1, 1992. The Commission may judicially notice that the increase in the index has been 62.4 percent. (This figure was obtained from the Bureau of Labor Statistics.) Thus, respondents ask the Commission to increase the \$75 attorneys' fee limit to \$121.80 in line with increases in the cost of living. This would increase the amount reimburseable of Lukas, McGowan's fees to \$18,887.50 and of Barab and Hart's fees to \$8,040.80.

97.517 in connection with examination sessions held November 12, 1990, January 6, 1991, or April 12, 1991; (3) and whether Charles P. Pascal willfully violated Section 97.17(e) or Section 97.517 in connection with an examination administered on November 12, 1990.

5. Respondents substantially prevailed in this case. The Bureau had sought revocation of the respondents' licenses. Ultimately a consent order was approved whereby the respondents agreed to only a three month suspension of their licenses retroactive to August 1, 1992. The consent order did not waive the respondents' rights under the EAJA. Prior to the hearing in this proceeding, respondents offered to take an even greater suspension if the Bureau would not press for revocation. Yet, the Bureau pressed on for revocation without any substantial evidence of fraudulent intent on the part of the respondents.

6. Although it is the burden of the Bureau to show that its position in the litigation was substantially justified, respondents assert that the Bureau's position in this litigation was not substantially justified in alleging a violation of either Section 97.17(e) or Section 97.517, in that the Bureau had neither tendered nor possessed any credible or admissible evidence that the respondents attempted to assist individuals to obtain amateur licenses by fraudulent means or that the respondents ever administered or certified an examination by fraudulent means. Indeed, at a prehearing conference the Bureau admitted it lacked any direct evidence of fraud with respect to

this case. Tr. 300-01. And while the respondents admit that Ms. Crane violated Rule Section 97.515 in acting as a volunteer examiner for her daughter, Commission precedent did not indicate that such a violation justified revocation of license. Indeed, in the only case of which the respondents are aware, such a violation resulted in a notice of forfeiture of a mere \$500. Accordingly, pushing for revocation of license on this basis cannot be considered substantially justified even where the one violation was admitted, and it certainly cannot be a basis for the Bureau attempting to take Mr. Pascal's license.

7. Moreover, special circumstances in this case indicate an egregious lack of substantial justification of the Bureau's position. The Bureau pushed its position for revocation despite having received statements from each of the volunteer examiners and from a number of students present at the August 4, 1991, August 24, 1991 and September 14, 1991 examination sessions, all of whom denied the Bureau's allegations that the examinations given those days had been compromised or that the respondents had done anything wrong in connection with those examinations. Additionally, in the face of those uniform denials of any wrongdoing on the part of the respondents, the Bureau accepted without critical examination allegations made by non-government persons who had conducted a "sting operation" against the respondents and who had a bias against them. Even then, the Bureau repeatedly admitted that it had no direct evidence of wrong doing on the part of the respondents. See e.g., Tr. 300-

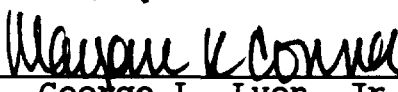
02. Furthermore, the Bureau negligently tendered a transcript of a tape recording which was incomplete and misleading despite being advised of that fact by counsel for the respondents. These circumstances all highlight and underscore the general lack of justification of the Bureau's position.

8. Attached herewith in accordance with the rules are the following documentation: Exhibit A, Net Worth Statement of Charles P. Pascal; Exhibit B, Net Worth Statement of Sandra V. Crane; Exhibit C, Listing of Fees and Expenses of Lukas, McGowan, Nace & Gutierrez; Exhibit D, Listing of Fees and Expenses of Barab and Hart; Exhibit E, Declaration of Charles P. Pascal; Exhibit F, Declaration of Sandra V. Crane.

Respectfully submitted,

CHARLES P. PASCAL

SANDRA V. CRANE

By   
George L. Lyon, Jr.  
Marjorie K. Conner  
Their Counsel

Lukas, McGowan, Nace and Gutierrez, Chartered  
1819 H Street, N.W., 7th Floor  
Washington, D.C. 20006

(202) 857-3500

Martin J. Barab  
Of Counsel to Sandra Crane  
9606 Santa Monica Blvd., 3rd Floor  
Beverly Hills, CA 90210

(310) 859-6644

November 4, 1992

**EXHIBIT A**

**CHARLES P. PASCAL NET WORTH STATEMENT**  
(as of April 24, 1992)

**Assets**

Cash	8,000	
Radio Equipment	1,500	
Personal effects & Furniture	2,000	
Repeater	1,500	
Total		13,000

**Liabilities**

Credit Card Debt	3,600	
Total		3,600
Net Worth		9,400

**EXHIBIT B**



**NET WORTH STATEMENT OF SANDRA V. CRANE**  
(as of April 24, 1992)

**Assets**

Cash	7,500	
Securities	50,000	
Condo	320,000	
Interest in Daughter's Condo	50,000	
Autos	6,000	
Trailer	5,000	
Jewelry	40,000	
Radio Equipment	10,000	
Other Personal Effects	9,500	
Total		498,000

**Liabilities<sup>1</sup>**

Credit Card Debt	4,000	
Car Loan	3,000	
Condo Loan	230,000	
Trailer loan	2,100	
Taxes	1,700	
Total		240,800
Net Worth		258,000

1 Excludes contingent liability of 120,000 (daughter's condo loan).

**EXHIBIT C**

1	2	EXPENSE	4	5	6
Westlaw	EXPENSE	OFF SITE	EXPENSE	CAP Hill	
	COURIER +	RESEARCH	SUBPOENA	REPORTING	LITIGATION
	FED EX.	PHOTO COPY	SERVING.		COPIES
	21.00				
	42.00	11982			
	53.50		165.00		11982
	238.25				
75.00				273.96	
75.00	354.75	11982	165.00	273.96	
-	-	-	-	-	
75.00	354.75	11982	165.00	273.96	11982

Lukas, McGowan, Nace & Gutierrez, Chartered  
1819 H Street, N.W., 7th Floor  
Washington, D.C. 20006  
(202) 857-3500

June 1, 1992

Billed through 05/28/92

Bill number 285-00000-003 GL

Mr. Charles P. Pascal  
610 East Proctor  
Apt. #2  
Carson City, Nevada 89701

Prepaid balance brought forward \$ 3,000.00 CR

FOR PROFESSIONAL SERVICES RENDERED

05/15/92 NN	FCC Filing	.10	hrs	5.00
05/15/92 GL	Review re materials from Pascal	1.00	hrs	195.00
05/15/92 GL	Telephone conference with client revocation proceeding	.30	hrs	58.50
05/15/92 GL	Telephone conference with Eric Malineu re revocation hearing	.30	hrs	58.50
05/15/92 GL	Letter to R. McNamara	.30	hrs	58.50
05/18/92 GL	Telephone conference with client	.30	hrs	58.50
05/20/92 BAS	Hand delivery to 2025 M St.	.10	hrs	5.50
05/22/92 GL	Telephone conference with R. McNamara	.20	hrs	39.00
05/22/92 GL	Telephone conference with B. McNamara	.20	hrs	39.00
05/28/92 GL	Attend meeting at FCC re settlement and discovery	1.50	hrs	292.50

Total fees for this matter \$ 810.00

DISBURSEMENTS

05/28/92	Postage	.29
05/28/92	Xerox	1.80
Total disbursements for this matter		\$ 2.09

BILLING SUMMARY

TOTAL FEES \$ 810.00

Mr. Charles P. Pascal  
Bill number 285-00000-003 GL

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TOTAL DISBURSEMENTS	\$ 2.09	
	-----	
TOTAL CHARGES FOR THIS BILL	\$ 812.09	
LESS PREPAID AMOUNT	\$ 812.09	CR
	-----	
TOTAL BALANCE NOW DUE	\$ .00	
PREPAID BALANCE CARRIED FORWARD	\$ 2,187.91	CR

Payment is requested within 30 days of invoice date.  
Please indicate account number(s) with payments.  
Thank You!

Lukas, McGowan, Nace & Gutierrez, Chartered  
1819 H Street, N.W., 7th Floor  
Washington, D.C. 20006  
(202) 857-3500

July 6, 1992

Billed through 06/30/92

Bill number 285-00000-007 GL

Mr. Charles P. Pascal  
610 East Proctor  
Apt. #2  
Carson City, Nevada 89701

Balance forward as of bill number 003 dated 06/01/92	\$	812.09	
Payments received since last bill (last payment 06/29/92)	\$	812.09	
		-----	
Net balance forward	\$	.00	
Prepaid balance brought forward	\$	2,687.91	CR

FOR PROFESSIONAL SERVICES RENDERED

05/29/92 GL	Draft conflict letter to Crain	1.50 hrs	.00
06/01/92 GL	Prepare letter to Bureau re hearing	1.30 hrs	253.50
06/01/92 GL	Prepare FOIA requirement	.60 hrs	117.00
06/01/92 GL	Telephone conference with T. Fitzgibbon	.20 hrs	39.00
06/01/92 NN	FCC Filing	.10 hrs	5.00
06/02/92 GL	Telephone conference with T. Fitzgibbon	.30 hrs	58.50
06/02/92 GL	Letter to T. Fitzgibbon	.40 hrs	78.00
06/02/92 GL	Telephone conference with C. Pascal re hearing	.30 hrs	58.50
06/02/92 GL	Telephone conference with T. Fitzgibbon	.30 hrs	58.50
06/02/92 RC	Hand Delivery to Post office to send letter Express mail	.60 hrs	27.00
06/05/92 GL	Telephone conference with T. Fitzgibbon	.20 hrs	39.00
06/19/92 GL	Telephone conference with T. Fitzgibbon	.50 hrs	97.50
06/22/92 GL	Telephone conference with C. Pascal	1.30 hrs	253.50
06/23/92 GL	Telephone conference with C. Pascal	.40 hrs	78.00
06/23/92 GL	Telephone conference with S. Crane	.50 hrs	97.50

Mr. Charles P. Pascal  
Bill number 285-00000-007 GL

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06/24/92	EDQ	Preparation re notice of application	.60	hrs	54.00
06/25/92	GL	Prepare Notice of Appearance	.30	hrs	58.50
06/26/92	GL	Letter to Pascal and Crane	.30	hrs	58.50
06/26/92	RC	FCC Filing	.10	hrs	4.50
06/26/92	RC	Hand Delivery to FCC - 2025 M St., Rm. 5328	.10	hrs	4.50
06/26/92	RC	Hand Delivery to FCC - 2000 L St., Rm. 226	.30	hrs	13.50
06/28/92	GL	Prepare Witness list and Evidence Summary	2.50	hrs	487.50
06/29/92	EDQ	Revise Notice of Appearance	.35	hrs	31.50
06/29/92	GL	Telephone conference with S. Crane/C. Pascal	.80	hrs	156.00
06/29/92	GL	Revise Witness List	1.00	hrs	195.00
06/29/92	GL	Telephone conference with C. Pascal	.20	hrs	39.00
06/30/92	GL	Telephone conference with M. Barab	.30	hrs	58.50

Total fees for this matter \$ 2,421.50

#### DISBURSEMENTS

06/30/92	Long Distance	12.67
06/30/92	Miscellaneous	9.95
06/30/92	Xerox	11.80
06/30/92	Federal Express	21.00

Total disbursements for this matter \$ 55.42

#### BILLING SUMMARY

TOTAL FEES	\$ 2,421.50	
TOTAL DISBURSEMENTS	\$ 55.42	
TOTAL CHARGES FOR THIS BILL	\$ 2,476.92	
LESS PREPAID AMOUNT	\$ 2,476.92	CR
TOTAL BALANCE NOW DUE	\$ .00	
PREPAID BALANCE CARRIED FORWARD	\$ 210.99	CR
Adjustment - 1/2 of total June bill transferred to client 285A, per G. Lyon.	\$ 1238.46	CR
Prepaid balance carried forward	(\$ 1449.45 )	

Payment is requested within 30 days of invoice date.  
Please indicate account number(s) with payments.  
Thank You!

Lukas, McGowan, Nace & Gutierrez, Chartered  
1819 H Street, N.W., 7th Floor  
Washington, D.C. 20006  
(202) 857-3500

August 7, 1992

Billed through 07/30/92

Bill number 285-00000-013 GL

Mr. Charles P. Pascal  
610 East Proctor  
Apt. #2  
Carson City, Nevada 89701

Balance forward as of bill number 007 dated 07/06/92	\$ 2,476.92	
Payments received since last bill (last payment 08/06/92)	\$ 2,476.92	
A/R Adjustments made since last bill	\$ 1,238.46	CR
	-----	
Net balance forward	\$ 1,238.46	CR
Prepaid balance brought forward	\$ 710.99	CR

FOR PROFESSIONAL SERVICES RENDERED

06/15/92 GL	Telephone conference with T. Fitzgibbon	.30 hrs	58.50
06/16/92 GL	Review re bureau witness list	.20 hrs	39.00
06/29/92 BAS	Xerox pleading and mail out	.30 hrs	16.50
06/29/92 BAS	FCC filing	.10 hrs	5.50
06/29/92 BAS	2 hand del. to 2025 M St.; 1 hand del. to 2000 L St.	.30 hrs	16.50
07/02/92 GL	Letter to S. Crane	.10 hrs	19.50
07/02/92 GL	Letter to C. Pascal	.10 hrs	19.50
07/05/92 GL	Prepare discovery motions	1.00 hrs	195.00
07/06/92 GL	Prepare discovery documents	2.00 hrs	390.00
07/06/92 GL	Letter to Pascal	.20 hrs	39.00
07/06/92 RC	FCC Filing	.10 hrs	4.50
07/06/92 RC	Hand Delivery to FCC - 2025 M St., Rm. 5328 & 5331	.10 hrs	4.50
07/06/92 RC	Hand Delivery to FCC - 2000 L Street	.20 hrs	9.00
07/06/92 GL	Letter to Crane	.20 hrs	39.00
07/07/92 GL	Telephone conference with T. Fitzgibbon	.20 hrs	39.00
07/09/92 RC	FCC Filing	.10 hrs	4.50
07/09/92 RC	Hand Delivery to FCC - 2025 M St., Rm. 5331 & 5328	.10 hrs	4.50
07/09/92 GL	Prepare and file responses to interrogatories	1.00 hrs	195.00
07/09/92 RC	Hand Delivery to FCC - 2000 L St.	.20 hrs	9.00



Mr. Charles P. Pascal  
Bill number 285-00000-013 GL

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07/09/92 RC	FCC Filing	.10 hrs	4.50
07/13/92 GL	Telephone conference with E. Malinen re FOIA request.	.30 hrs	58.50
07/13/92 GL	Telephone conference with E. Malinen re FOIA.	.20 hrs	39.00
07/14/92 GL	Review re documents at the FCC and Teleco with Charles Pascal.	3.00 hrs	585.00
07/22/92 RC	Pick up at Downtown Copy Center	.10 hrs	4.50
07/22/92 RC	Pick up at FCC - 2025 M St., Rm. 5322	.10 hrs	4.50
07/22/92 GL	Telephone conference with C. Pascal re hearing	.30 hrs	58.50
07/22/92 GL	Telephone conference with M. Barab re LA hearing	.30 hrs	58.50
07/23/92 GL	Letter to C. Pascal	.20 hrs	39.00
07/23/92 GL	Letter to S. Crane	.20 hrs	39.00
07/24/92 MC	Phone call to J. Chachkin re subpoena	.20 hrs	24.00
07/24/92 GL	Prepare subpoena request	1.20 hrs	234.00
07/24/92 GL	Prepare Interrogatory answers	.50 hrs	97.50
07/24/92 GL	Review re FOIA documents	1.50 hrs	292.50
07/24/92 RC	Hand Delivery to FCC - 2000 L Street	.20 hrs	9.00
07/24/92 GL	Telephone conference with M. Barab re subpoena	.30 hrs	58.50
07/24/92 MC	Travel to/from J. Chachkin's office re subpoena	.30 hrs	36.00
07/28/92 BAS	FCC filing	.10 hrs	5.50
07/28/92 GL	Draft venue change request	1.50 hrs	292.50
07/28/92 BAS	Hand delivery to 2025 M St. and 2000 L St.	.20 hrs	11.00
07/29/92 GL	Telephone conference with S. Crane	1.20 hrs	234.00
07/29/92 GL	Prepare change of venue request	1.50 hrs	292.50
07/29/92 GL	Telephone conference with E. Malinen	.30 hrs	58.50
07/29/92 GL	Telephone conference with C. Pascal	.70 hrs	136.50
07/29/92 GL	Research re David Morse	.40 hrs	78.00
07/29/92 MC	Office conference re subpoena F. Maia	.20 hrs	24.00
07/30/92 BAS	FCC filing	.10 hrs	5.50
07/30/92 MC	Prepare request for subpoena/subpoena	1.00 hrs	120.00
07/30/92 BAS	Hand del. to 2025 M St. and 2000 L St.	.20 hrs	11.00
07/30/92 BAS	Hand del. to 2000 L St.	.30 hrs	16.50
07/30/92 GL	Credit per G. Lyon 1/2 total fees is transferred to 285A, Sandra V. Crane.	.00 hrs	2,018.00-

Total fees for this matter

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\$ 2,018.00

Mr. Charles P. Pascal  
Bill number 285-00000-013 GL

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DISBURSEMENTS

07/30/92	About this bill: credit per G. Lyon	
	1/2 disbursements transferred to	
	285A, Sandra V. Crane.	133.91-
07/30/92	Long Distance	7.55
07/30/92	Postage	12.94
07/30/92	Miscellaneous	4.00
07/30/92	Xerox	81.50
07/30/92	Federal Express	42.00
07/30/92	Off-site research photocopying	119.82
		-----
	Total disbursements for this matter	\$ 133.90

BILLING SUMMARY

TOTAL FEES	\$ 2,018.00	
TOTAL DISBURSEMENTS	\$ 133.90	
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TOTAL CHARGES FOR THIS BILL	\$ 2,151.90	
NET BALANCE FORWARD	\$ 1,238.46	CR
LESS PREPAID AMOUNT	\$ 710.99	CR
	-----	
TOTAL BALANCE NOW DUE	\$ 202.45	

Payment is requested within 30 days of invoice date.  
Please indicate account number(s) with payments.

Thank You!

Lukas, McGowan, Nace & Gutierrez, Chartered  
1819 H Street, N.W., 7th Floor  
Washington, D.C. 20006  
(202) 857-3500

September 10, 1992

Billed through 08/31/92

Bill number 285-00000-019 GL

Mr. Charles P. Pascal  
829 Lyell Way  
Gardnerville, NV 89410

Balance forward as of bill number 013 dated 08/07/92	\$ 913.44	
Payments received since last bill (last payment 08/31/92)	\$ 1,710.99	
	-----	
Net balance forward	\$ 797.55	CR

FOR PROFESSIONAL SERVICES RENDERED

07/31/92 MC	Office conference re subpoena F. Maia	.20 hrs	24.00
07/31/92 MC	Research re scope of subpoena	.50 hrs	60.00
07/31/92 MC	Revise joint motion change venue	.50 hrs	60.00
07/31/92 MC	Research re Pvt Process Servers	.50 hrs	60.00
07/31/92 MC	Letter to F. Maia re Depos	.20 hrs	24.00
07/31/92 MC	Letter to J. Taff re service of subpoena	.20 hrs	24.00
07/31/92 BAS	FCC Filing	.10 hrs	5.50
07/31/92 MC	Research re scope of subpoena	2.00 hrs	240.00
07/31/92 MC	Prepare w/draw motion directed to Chackin	.00 hrs	.00
07/31/92 BAS	Hand del. to 2025 M St. and 2000 L St.	.20 hrs	11.00
07/31/92 BAS	Hand del. subpoena to 2000 L Street	.20 hrs	11.00
08/03/92 GL	Telephone conference with C. Imlay re FOIA	.30 hrs	58.50
08/03/92 GL	Draft memo to Barab re McElwaine deposition	1.00 hrs	195.00
08/03/92 GL	Telephone conference with T. Fitz Gibbon re deposition	.20 hrs	39.00
08/03/92 GL	Telephone conference with S. Crane re deposition	.20 hrs	39.00
08/04/92 GL	Telephone conference with M. Barab	.30 hrs	58.50
08/05/92 GL	Telephone conference with C. Pascal	.20 hrs	39.00
08/05/92 GL	Telephone conference with C. Pascal and review notice of apparent liability notice	.20 hrs	39.00

Mr. Charles P. Pascal  
Bill number 285-00000-019 GL

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08/06/92 GL	Telephone conference with Judge Chachkin re subpoena request	.30 hrs	58.50
08/06/92 GL	Telephone conference with Judge Chachkin re subpoena request	.30 hrs	58.50
08/06/92 GL	Office conference w/M. Conner re revisions to subpoena request and resubmit pleadings	.30 hrs	58.50
08/06/92 GL	Prepare materials for submission to Barab re McElwain	.50 hrs	97.50
08/07/92 GL	Telephone conference with	.30 hrs	58.50
08/07/92 RC	FCC Filing	.10 hrs	4.50
08/07/92 RC	Hand Delivery to FCC - 2025 M Street	.20 hrs	9.00
08/07/92 MC	Prepare notice of deposition - David Morse	.75 hrs	90.00
08/07/92 RC	Hand Delivery to FCC - 2000 L Street	.20 hrs	9.00
08/11/92 GL	Prepare reply to Bureau opposition to charges of venue motion	.00 hrs	.00
08/12/92 GL	Telephone conference with T. Fitz Gibbon	.20 hrs	39.00
08/12/92 GL	Prepare reply to Bureau opposition re changes of venue	.00 hrs	.00
08/13/92 GL	Prepare Reply to Bureau's Opposition to Venue change	1.50 hrs	292.50
08/13/92 GL	Letter to clients re filing	.20 hrs	39.00
08/13/92 BAS	FCC filing	.10 hrs	5.50
08/13/92 BAS	Hand del. to 2025 M St.	.20 hrs	11.00
08/13/92 RC	Hand Delivery to 2000 L Street	.20 hrs	9.00
08/14/92 MC	Letter to subpoena request	.30 hrs	36.00
08/17/92 MC	Edit subpoena request Morse	.20 hrs	24.00
08/17/92 MC	Prepare subpoena Morse	.50 hrs	60.00
08/17/92 GL	Review re Judge's Order denying field hearing	.20 hrs	39.00
08/17/92 GL	Review re subpoena request	.20 hrs	39.00
08/17/92 GL	Telephone conference with T. Fitz Gibbon and review text of pleading drafted by Bureau re discovery	.30 hrs	58.50
08/17/92 MC	Revise subpoena and subpoena request Morse	.50 hrs	60.00
08/17/92 BAS	Misc. - subpoenas	.30 hrs	16.50
08/18/92 GL	Research re amateur rules	.50 hrs	97.50
08/18/92 GL	Letter to Crane re ARRL	.20 hrs	39.00
08/19/92 GL	Letter to Crane and Pascal	.20 hrs	39.00
08/24/92 GL	Telephone conference with L. Ferrante re August 4 test session	.30 hrs	58.50

Mr. Charles P. Pascal  
Bill number 285-00000-019 GL

PAGE 3

08/24/92 GL	Telephone conference with T. Fitz Gibbon	.30 hrs	58.50
08/24/92 GL	Review re McElwain deposition	1.50 hrs	292.50
08/25/92 RC	FCC Filing	.10 hrs	4.50
08/25/92 RC	Hand Delivery to FCC - 2025 M Street	.10 hrs	4.50
08/25/92 GL	Review re Quinn's statement	.20 hrs	39.00
08/25/92 GL	Telephone conference with C. Pascal	.50 hrs	97.50
08/25/92 GL	Telephone conference with S. Crane	.30 hrs	58.50
08/25/92 GL	Telephone conference with E. Malinen	.30 hrs	58.50
08/25/92 GL	Review re tape	.30 hrs	58.50
08/25/92 GL	Review re McElwain deposition	.50 hrs	97.50
08/27/92 GL	Telephone conference with M. Barab re settlement and other things	.30 hrs	58.50
08/27/92 GL	Telephone conference with T. Fitz Gibbon and E. Malinen re settlement offer	.30 hrs	58.50
08/27/92 GL	Telephone conference with C. Pascal	.40 hrs	78.00
08/27/92 GL	Office conference with RL re settlement proposal	.30 hrs	58.50
08/27/92 GL	Review and revise transcript of tape	1.00 hrs	195.00
08/31/92 RC	Hand Delivery to FCC - 2025 M St, Rm. 5328	.10 hrs	4.50
08/31/92 GL	Prepare hearing exhibits	1.00 hrs	195.00
08/31/92 GL	Credit per G. Lyon, 1/2 charges for professional services are transferred to client 285-A.	.00 hrs	1,906.00-

Total fees for this matter

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\$ 1,906.00

#### DISBURSEMENTS

07/15/92	Litigation copies	119.82
08/31/92	About this bill: credit per G. Lyon, 1/2 disbursement charges are transferred to client 285-A.	241.18-
08/31/92	Long Distance	20.99
08/31/92	Postage	13.05
08/31/92	Courier	6.50
08/31/92	Xerox	110.00
08/31/92	Federal Express	47.00
08/31/92	Subpoena Serving	165.00

Total disbursements for this matter

-----  
\$ 241.18

#### BILLING SUMMARY

TOTAL FEES

\$ 1,906.00

Mr. Charles P. Pascal  
Bill number 285-00000-019 GL

PAGE 4

TOTAL DISBURSEMENTS	\$ 241.18	
	-----	
TOTAL CHARGES FOR THIS BILL	\$ 2,147.18	
NET BALANCE FORWARD	\$ 797.55	CR
	-----	
TOTAL BALANCE NOW DUE	\$ 1,349.63	

Payment is requested within 30 days of invoice date.  
Please indicate account number(s) with payments.  
Thank You!

Lukas, McGowan, Nace & Gutierrez, Chartered  
1819 H Street, N.W., 7th Floor  
Washington, D.C. 20006  
(202) 857-3500

October 7, 1992

Billed through 09/30/92

Bill number 285A-00000-012 GL

Sandra V. Crane  
4734 La Valla Marina J  
Marina Del Rey, CA 90292

Balance forward as of bill number 009 dated 09/09/92 \$ 2,432.55

FOR PROFESSIONAL SERVICES RENDERED

09/30/92 GL Adjustment per G. Lyon;  
1/2 total fees transferred  
from Client #285 (Charles P. Pascal). .00 hrs 7,001.75

Total fees for this matter \$ 7,001.75

DISBURSEMENTS

09/30/92 About this bill: adjustment per G. Lyon;  
1/2 total expense is transferred from  
Client #285. 415.29

Total disbursements for this matter \$ 415.29

BILLING SUMMARY

TOTAL FEES	\$ 7,001.75
TOTAL DISBURSEMENTS	\$ 415.29
TOTAL CHARGES FOR THIS BILL	\$ 7,417.04
NET BALANCE FORWARD	\$ 2,432.55
TOTAL BALANCE NOW DUE	\$ 9,849.59

Payment is requested within 30 days of invoice date.  
Please indicate account number(s) with payments.  
Thank You!

Lukas, McGowan, Nace & Gutierrez, Chartered  
1819 H Street, N.W., 7th Floor  
Washington, D.C. 20006  
(202) 857-3500

September 9, 1992

Billed through 08/31/92

Bill number 285A-00000-009 GL

Sandra V. Crane  
4734 La Valla Marina J  
Marina Del Rey, CA 90292

Balance forward as of bill number 006 dated 08/07/92	\$ 2,151.91
Payments received since last bill (last payment 08/21/92)	\$ 1,866.54
	-----
Net balance forward	\$ 285.37

FOR PROFESSIONAL SERVICES RENDERED

08/31/92 GL	Adjustment per G. Lyon, 1/2 charges for professional services transferred from client 285.	.00 hrs	1,906.00
			-----
	Total fees for this matter		\$ 1,906.00

DISBURSEMENTS

08/31/92	About this bill: adjustment per G. Lyon, 1/2 disbursements transferred from client 285.		241.18
			-----
	Total disbursements for this matter		\$ 241.18

BILLING SUMMARY

TOTAL FEES	\$ 1,906.00
TOTAL DISBURSEMENTS	\$ 241.18
	-----
TOTAL CHARGES FOR THIS BILL	\$ 2,147.18
NET BALANCE FORWARD	\$ 285.37
	-----
TOTAL BALANCE NOW DUE	\$ 2,432.55

Payment is requested within 30 days of invoice date.  
Please indicate account number(s) with payments.  
Thank You!



Lukas, McGowan, Nace & Gutierrez, Chartered  
1819 H Street, N.W., 7th Floor  
Washington, D.C. 20006  
(202) 857-3500

August 7, 1992

Billed through 07/30/92

Bill number 285A-00000-006 GL

Sandra V. Crane  
4734 La Valla Marina J  
Marina Del Rey, CA 90292

Balance forward as of bill number 004 dated 07/06/92	\$ 1,433.46	
Payments received since last bill (last payment 06/19/92)	\$ 1,433.46	
	-----	
Net balance forward	\$ .00	
Prepaid balance brought forward	\$ 1,566.54	CR

FOR PROFESSIONAL SERVICES RENDERED

07/30/92 GL	Adjustment per G. Lyon. 1/2 total fees on professional services for month of July is transferred from client 285.	.00 hrs	2,018.00	
			-----	
	Total fees for this matter		\$ 2,018.00	

DISBURSEMENTS

07/30/92	About this bill: adjustment per G. Lyon 1/2 disbursements, for July, transferred from client 285.		133.91	
			-----	
	Total disbursements for this matter		\$ 133.91	

BILLING SUMMARY

TOTAL FEES	\$ 2,018.00	
TOTAL DISBURSEMENTS	\$ 133.91	
	-----	
TOTAL CHARGES FOR THIS BILL	\$ 2,151.91	
LESS PREPAID AMOUNT	\$ 1,566.54	CR
	-----	
TOTAL BALANCE NOW DUE	\$ 585.37	

Payment is requested within 30 days of invoice date.  
Please indicate account number(s) with payments.

Thank You!